

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

GENTEX CORPORATION and INDIGO
TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC.,

Involuntary Plaintiff,

v.

META PLATFORMS, INC. and META
PLATFORMS TECHNOLOGIES, LLC,

Defendants.

Case No. 4:22-cv-03892-YGR

**DECLARATION OF ELLISEN
SHELTON TURNER IN SUPPORT OF
JOINT MOTION TO DISMISS AND
REPLY IN SUPPORT OF MOTION TO
DISMISS**

1 I, Ellisen Shelton Turner, do hereby declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 with the law firm of Kirkland & Ellis LLP, located at 2049 Century Park East, Suite 3700, Los
4 Angeles, CA 90067. I am counsel for Defendants Meta Platforms, Inc. and Meta Platform
5 Technologies, LLC (collectively, “Meta” or “Defendants”) in the above-captioned action. I have
6 personal knowledge of the matters set forth below and if called and sworn as a witness, I could and
7 would testify competently to the facts set forth herein.

8 2. I make this declaration in support of voluntary plaintiffs Gentex Corporation
9 (“Gentex”) and Indigo Technologies, LLC (“Indigo”) (collectively, “Plaintiffs”) and Defendants’ Joint
10 Motion to Dismiss and their Reply in Support of the Joint Motion to Dismiss.

11 3. Exhibit A to the Joint Motion to Dismiss (Dkt. 139-1, filed under seal at Dkt. 137-4) is
12 a true and correct copy of the 2024 Settlement Agreement between Plaintiffs and Defendants.

13 4. Exhibit B to the Joint Motion to Dismiss (Dkt. 139-2, filed under seal at Dkt. 137-5) is
14 a true and correct copy of the 2023 Term Sheet signed between Plaintiffs, Defendants, and involuntary
15 plaintiff Thales Visionix, Inc. (“Thales”).

16 5. Exhibit C to the Joint Motion to Dismiss (Dkt. 139-3, filed under seal at Dkt. 138-3) is
17 a true and correct copy of Thales’s Responses And Objections To Meta’s First & Second Sets Of
18 Interrogatories (Nos. 1-14 And 15), dated January 20, 2023.

19 6. Exhibit D to the Reply in Support of the Joint Motion to Dismiss is a true and correct
20 copy of email correspondence from Meredith Martin Addy to me, dated December 26, 2023.

21 7. I declare under penalty of perjury under the laws of the United States of America that
22 the foregoing is true and correct to the best of my knowledge.

23 Executed this 7th day of February 2024 in Los Angeles, California.

24 /s/ Ellisen Shelton Turner

25 Ellisen Shelton Turner

26 *Counsel for Defendants*

SIGNATURE ATTESTATION

Under Local Rule 5-1(i)(3), I attest that I have obtained concurrence in the filing of this document from the other signatory.

Dated: February 7, 2024



Matthew S. Warren